

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,**  
et al.,

Defendants.

CIVIL NO. 12-2039 (FAB)

**JOINT MOTION IN COMPLIANCE WITH ORDER AT DOCKET NO. 2052  
REGARDING THE SPECIAL MASTER'S PROPOSED BUDGET FOR FY23**

COME NOW, Plaintiff, the United States of America, and Defendants, the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (collectively, “the Parties”), and respectfully submit the Special Master’s proposed budget for Fiscal Year 2023, in compliance with the Court’s Order of June 3, 2022, ECF No. 2052. As set forth below, the Parties’ discussions with the Special Master regarding his proposed budget for FY 2023 remain ongoing, pursuant to the Joint Stipulation Effectuating the Participation of the Special Master (“Stipulated Order on the Special Master”), ECF No. 1148 (approved by the Court on Mar. 18, 2019, in ECF No. 1152). The Parties expect to complete negotiations by June 20, 2022. The Special Master’s proposed budget in the amount of \$507,000, is attached hereto as Exhibit A.

1. The Stipulated Order on the Special Master outlines the steps that the Special Master and the Parties must take to negotiate and approve an operating budget each fiscal year. Specifically, the Stipulated Order on the Special Master provides:

For each fiscal year after Fiscal Year 2019-20, the Special Master shall submit a proposed annual budget to the Parties at least sixty (60) days prior to the conclusion of the budget year for approval. The Parties and the Special Master agree to discuss and negotiate the proposed annual budget

in good faith to ensure that the Special Master has sufficient and necessary resources to carry out his duties under this Stipulation and the Court's Orders. The agreed-upon annual budget shall be filed with the Court through an informative motion before the start of each operating budget period. If the Parties and the Special Master are unable to agree on an annual budget, any party or the Special Master may request this Court to resolve the matter.

*Id.* at ¶ 28.

2. In compliance with the Stipulated Order on the Special Master, the Special Master submitted a proposed budget for FY 2023 to the Parties for review on April 4, 2022. The proposed budget seeks \$507,000, for expenses related to professional fees and travel for the Special Master and two assistant special masters. Ex. A, Special Master's Proposed Budget at 1. The Special Master's budget proposal is for the same amount as his current operating budget.

3. The Parties' discussion with the Special Master regarding his proposed budget remain ongoing. The Parties will continue to work expeditiously and in good faith to complete negotiations by June 20, 2022,<sup>1</sup> to ensure that the Special Master "has sufficient and necessary resources to carry out his duties under [the] Stipulation and the Court's Orders," as set forth in the Stipulated Order on the Special Master. Stipulated Order at ¶ 28. The Parties will inform the Court once the parties have fully discussed with the Special Master the work plan to be performed by his office and the reporting that will be produced to the Parties.

4. On June 3, 2022, the Court instructed the Parties to "file a joint motion submitting the proposed budgets for the Monitor and the Special Master, with the proposed budgets that the Monitor and the Special Master have submitted to the parties attached to the joint motion."

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<sup>1</sup> The Court states that it must know the proposed budgets for the Special Master and Monitor before July 1, 2022, the start of the Commonwealth's fiscal year, "so that the Court may issue its annual order establishing the Monitor's and the Special Master's budgets." Order at 1, ECF No. 2052 (June 3, 2022).

Order, ECF No. 2052. In compliance with the Court's Order, the Special Master's proposed budget is attached. The Parties have submitted the Monitor's proposed budget, which the Parties have approved, by separate joint motion.

**WHEREFORE**, the Parties respectfully submit the budget proposed by the Special Master for FY 2023, which the Parties continue to negotiate in good faith and expect to resolve by June 20, 2022, in accordance with the Stipulated Order on the Special Master.

**WE HEREBY CERTIFY** that today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico using the CM/ECF system, which will send a copy and notification of filing to the Monitor, the Special Master, and all counsel of record.

**RESPECTFULLY SUBMITTED** this 13th day of June, 2022,

For Plaintiff UNITED STATES OF AMERICA:

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